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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RONALD J. MCINTOSH,)	NO. CV 09-00750 CRB
)	
Petitioner,)	OPPOSITION TO APPLICATION FOR ENTRY OF
)	COURT ORDERED PROTECTIVE ORDER
V.)	
)	
ERIC H. HOLDER, JR., ET AL.,)	
)	
Respondents.)	

The United States opposes McIntosh's Application for Entry of Court Ordered Protective Order. First, the government has filed a Motion to Stay proceedings while it consults with officials of the Federal Bureau of Investigation and at the Department of Justice. The United States Attorney's Office began that consultation on August 27, 2015, and will proceed expeditiously in determining whether to appeal the Court's order. The United States asks the Court to grant the stay and to take no action on McIntosh's Application until September 11, 2015, or if the government seeks appellate review, when appellate proceedings conclude.

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1 Second, the United States objects to McIntosh's proposed protective order. No protective order
2 is sufficient to guarantee that the disputed documents are not compromised, and the protective order
3 proposed by petitioner's counsel is particularly inadequate.

4 The government continues to believe that the 174 pages are privileged and not relevant to
5 McIntosh's claim and that their disclosure, even only to counsel for McIntosh, will cause damage to
6 important law enforcement interests.

7 The court should deny McIntosh's application.

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9 DATED: August 28, 2015.

Respectfully submitted,

10 MELINDA HAAG
11 United States Attorney

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13 /s/
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16 Assistant United States Attorneys
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